

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
	:	:CHAPTER 13
Gerald E. Kane	:	
xxx-xx-6227	:	
	:	
Debtor.	:	:CASE NO. 21-13401/MDC
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	:	
Truman 2021 SC9 Title Trust	:	
Movant,	:	
	:	
v.	:	:Courtroom Number 2
	:	
GERALD E. KANE	:	:Hearing Date: June 13, 2023 @ 10:30am
	:	
Debtor,	:	
And	:	
	:	
KENNETH E. WEST	:	
Trustee,	:	
	:	
Respondents.	:	
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**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Truman 2021 SC9 Title Trust has filed a motion for relief from automatic stay under 11 U.S.C. § 362(d) with the court to permit Movant to pursue its rights in the property described below to the extent and in the manner provided by any applicable contract documents and non-bankruptcy law.

106 South 24th Street, Brigantine, New Jersey 08203

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

1) If you do not want the Court to grant Movant relief from the automatic stay regarding the above property, or if you want the court to consider your views on the motion, then on or before June 8, 2023 (five days prior to the hearing date), you or your attorney must do all of the following:

a) File with the Court a written response to Movant's motion explaining your position. Your response must be filed with the Bankruptcy Clerk, at the United States Bankruptcy Court, Eastern District of Pennsylvania, Bankruptcy Clerk of Courts, Robert N. C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 202, Philadelphia, Pennsylvania 19107. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above:

b) You must also mail a copy to:

Emmanuel J. Argentieri, Esquire
ROMANO GARUBO & ARGENTIERI
52 Newton Avenue, P.O. Box 456
Woodbury, New Jersey 08096
Attorney for Movant

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street Suite 1813
Philadelphia, PA 19107
Chapter 13 Trustee

2) If you or your attorney do not take the steps described in Paragraph 1(a) and Paragraph 1(b) and attend the hearing, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested in the motion.

3) A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman, on June 13, 2023, at 10:30 a.m., United States Bankruptcy Court, Eastern District of Pennsylvania, Robert N. C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 202, Courtroom # 2, Philadelphia, Pennsylvania 19107.

4) If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in ¶1(b).

5) You may contact the Judge's Courtroom Deputy at (215) 408-2819 to find out whether the hearing has been canceled because no one filed an answer.

ROMANO GARUBO & ARGENTIERI
Attorneys for Movant

By: /s/ Emmanuel J. Argentieri
Emmanuel J. Argentieri, Esquire
PA Attorney ID No. 59264

Dated: May 16, 2023